

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X  
ELIZABETH BURBAGE, :

Plaintiff, :

- against - :

LOUIS PUBLIC COMPANY LIMITED and GROUP  
VOYAGERS, INC., :

Defendants. :

Case No. CV 07 37665  
and Twenty-Seven  
Related Actions  
(WCC)(GAY)

**AFFIDAVIT**

----- X  
NORMA BALDUCCI, :

Plaintiff, :

-against- :

LOUIS PUBLIC COMPANY LIMITED and GROUP  
VOYAGERS, INC., :

Defendants. :

Case No. 07 Civ. 3668 (WCC)

----- X  
LORRAINE CARPINO, :

Plaintiff, :

-against- :

LOUIS PUBLIC COMPANY LIMITED and GROUP  
VOYAGERS, INC., :

Defendants. :

Case No. 07 Civ. 6977 (WCC)

----- X  
PATRICIA DeASTIS :

Plaintiff, :

-against- :

LOUIS PUBLIC COMPANY LIMITED and GROUP  
VOYAGERS, INC., :

Defendants. :

Case No. 07 Civ. 3681 (WCC)

-----X	
ANN HARRIGAN,	:
	:
Plaintiff,	:
	:
-against-	:
	:
LOUIS PUBLIC COMPANY LIMITED and GROUP	:
VOYAGERS, INC.,	:
	:
Defendants.	:
-----X	
LAURA KOSSOW,	:
	:
Plaintiff,	:
	:
-against-	:
	:
LOUIS PUBLIC COMPANY LIMITED and GROUP	:
VOYAGERS, INC.,	:
	:
Defendants.	:
-----X	
LUCY VITALIANO,	:
	:
Plaintiff,	:
	:
-against-	:
	:
LOUIS PUBLIC COMPANY LIMITED and GROUP	:
VOYAGERS, INC.,	:
	:
Defendants.	:
-----X	

PAUL S. EDELMAN, being duly sworn, deposes and says:

I am counsel to the firm of Kreindler & Kreindler LLP and am fully acquainted with the facts and circumstances of this case. My firm has substituted for the firm of Todd J. Krouner and has filed Consents to Change Attorneys in the cases of Norma Balducci, Lorraine Carpino,

Patricia DeAstis, Ann Horrigan, Laurel Kossow and Lucy Vitaliano. We are awaiting signed consents from Lauren, Sarah and W. Henry Alderfer, but they are abroad and receipt of signed consents has been delayed. We now also represent 22 other clients of Mr. Krouner's, 17 of our own and 24 from Calgary, Canada. Of Mr. Krouner's cases only these 31 remain; the others have been settled.

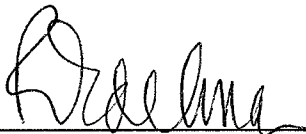
Attached to this affidavit are the following relevant documents which will be referred to in the accompanying Memorandum of Law.

1. The ticket of Defendant Louis Cruises received from Defendant Group Voyagers.
2. EC Law, 90/314/EEC (EC Package Travel Regulations).
3. The (so-called) Garrido cases decided under the above regulations;

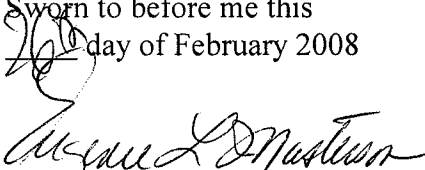
"Club Tour v. Garrido", (Porto, Portugal) which explains the reach of the directive, and discusses strict liability against a tour operator/organizer.

4. EU Summary of Council Directive 90/314/EEC on package travel.
5. Affirmation of Alexander Anolik concerning the EC Directive.

Dated: February 26, 2008

  
\_\_\_\_\_  
Paul S. Edelman

Sworn to before me this  
26 day of February 2008

  
\_\_\_\_\_  
Notary Public

**EUGENIE L. MASTERSON**  
Notary Public, State of New York  
No. 30-4719641  
Qualified in Nassau County  
Term Expires October 31, 2010